

IN THE DRAWING

A Replacement Sheet 1/6 is attached to label Fig. 1 "Prior Art" as requested in the Action.

REMARKS

New claims 11 and 12 correspond to prior elected claim 1, including the drive wheels, caterpillars and caster wheel, for example. Claim 11 includes a number of additional limitations to distinguish over the art in a number of ways. Claim 12 is broader, to direct attention to the inventive combination of prior claim 1 while retaining distinction from the art for the reasons of the Remarks.

New claims 11 and 12 also attend to the objections to claim 1 in the Action, and the rejections of claim 1 under 35 USC 112, second paragraph..

The withdrawal of claim 6 is still considered inappropriate, inasmuch as it further defined elements of claim 1, albeit without dependence. This is made clearer in new claim 13 that depends from claim 12. Further definition of parent claim limitations is not traversal by the dependence, but by the further limitation of parent claim limitations.

To the extent that the rejection of claim 1 under 35 USC 103 for obviousness from the cited Rabinovitz, et al. and Jiang patents might be applied to independent claims 11 and 12 is traversed on the basis of the caterpillars that are driven with the drive wheels 702 so that both the caterpillars and drive wheels provide driving traction together. In the Rabinovitz, et al. patent the wheels and caterpillars are interchangeable, so that only one works at a time, and the Jiang patent has only caterpillars. Therefore, the combination of references does not teach using both wheel and caterpillar traction, as claimed.

The clutch devices claimed cooperate with this, in that the wheel can be used to operate this. Since the patents do not teach simultaneous wheel and caterpillar action, they cannot disclose or suggest a wheel clutch.

The claimed invention also has a castor to aid in steering. By lifting off the caterpillars with the castor, the chair steers with the wheels and castor without dragging the caterpillars. As will be appreciated from Fig. 1A, for example, of the Rabinovitz, et al. patent, its caterpillars are lifted by their pivots (28, 30), and not the castor, and the Jiang patent, having no castor, cannot change this different disclosure.

Reconsideration and allowance are, therefore, requested.

Respectfully submitted,

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